

EXHIBIT A

IN THE CIRCUIT COURT OF KNOX COUNTY, TENNESSEE

Shannon Bitzer,

Plaintiff,

v.

Staff Journalists Jane/John Doe, WBIR, and TEGNA INC.,

Defendants.

Case No.: 1-186-25

COMPLAINT FOR DEFAMATION (LIBEL)

COMES NOW the Plaintiff, Shannon Bitzer, pro se, and files this Complaint against Defendants Jane Doe, WBIR, and Tegna Inc., and alleges as follows:

I. INTRODUCTION

This is an action for defamation (libel) arising from a false and defamatory article published by Defendants on or about July 2024, which wrongfully portrayed Plaintiff Shannon Bitzer as a violent participant in the January 6, 2021, events at the U.S. Capitol, causing severe reputational harm, emotional distress, and economic loss.

Plaintiff was acquitted of all charges related to January 6, 2021, further demonstrating the falsity of Defendants' portrayal.

II. PARTIES

Plaintiff Shannon Bitzer is an individual residing in Knoxville, Tennessee.

FILED
CHARLES D. SUCANO III
CLERK
2025 JUN -9 AM 10:20
KNOX COUNTY CIRCUIT,
CIVIL SESSIONS
AND JUVENILE COURTS

Defendants Jane or John Doe is an individual(s) employed by WBIR, a news outlet, and authored the defamatory article. Plaintiff is unaware of Defendant's true name at this time but will amend this Complaint upon ascertaining it.

Defendant WBIR is a television station and news outlet based at 1513 Bill Williams Avenue, Knoxville, Tennessee 37917, owned by Tegna Inc., which published the defamatory article.

Defendant Tegna Inc. is a corporation headquartered at 8350 Broad Street, Suite 2000, Tysons, Virginia 22102, and is the parent company of WBIR, responsible for its publications.

III. JURISDICTION AND VENUE

This Court has jurisdiction over this matter pursuant to Tenn. Code Ann. § 16-10-101, as the defamatory article was published in Knox County, Tennessee, and caused harm to Plaintiff.

Venue is proper in Knox County, Tennessee, pursuant to Tenn. Code Ann. § 20-4-101, as Defendants WBIR and Jane Doe operate and/or reside in this jurisdiction, and the defamatory publication occurred here.

IV. FACTUAL ALLEGATIONS

On January 6, 2021, Plaintiff Shannon Bitzer attended an event at the U.S. Capitol in Washington, D.C., where Plaintiff engaged solely in non-violent conduct, specifically chanting, without committing any acts of violence, injury, or property damage.

Plaintiff was initially charged with misdemeanor offenses related to January 6, 2021. After declining to cooperate with authorities, Plaintiff was charged with felony offenses. Plaintiff was acquitted of all charges on February 17th, 2025, in the U.S. District Court for the District of Columbia, Case No. 24-cr-00316, and was never convicted of any offense.

On or about July 2024, Defendants published an article titled “Shannon Bitzer Facing January 6 Insurrection Charges” on WBIR’s website (<https://www.wbir.com/article/news/crime/shannon-bitzer-facing-january-6-insurrection-charges/51-223bd6d7-a785-4253-b309-9f9c671217f7>).

The article falsely portrayed Plaintiff as a violent participant in the January 6, 2021, events, using selective still images to create a misleading impression of Plaintiff’s conduct, despite Defendants’ access to video evidence and court records showing Plaintiff’s actions were limited to chanting and moving a stanchion, and that Plaintiff was acquitted.

Plaintiff possesses video footage from publicly available Capitol security footage, timestamped January 6, 2021, 3:15 - 4:30 PM, showing Plaintiff chanting peacefully and not engaging in physical violence. This footage directly contradicts the still images used in the article.

Plaintiff’s court records from the U.S. District Court for the District of Columbia, Case No. 24-cr-00316, confirms Plaintiff was acquitted and faced no convictions, further evidencing the falsity of the article’s portrayal.

The portrayal of Plaintiff as violent was false and defamatory, as Plaintiff did not engage in any violent acts on January 6, 2021, and was acquitted of all related charges.

Defendants acted with actual malice, knowing the portrayal was false or with reckless disregard for its truth, as they deliberately used misleading still images instead of available video footage and failed to acknowledge Plaintiff's acquittal. Plaintiff believes Defendants were tipped off by a third party with access to full video evidence, yet chose to misrepresent Plaintiff's actions.

The article was widely disseminated to the public, resulting in severe reputational harm, emotional distress, and economic loss, including:

- a. Being blackballed as a C-level executive in the hemp industry, where the plaintiff has faced discrimination.
- b. Mental health treatment for emotional distress, including therapy for PTSD by Roderick Lewis LCP/MHSP. In addition, the Plaintiff suffers from persecutory nightmares, and has been prescribed Fluoxetine, Propranolol, and Cyclobenzaprine.

V. CAUSE OF ACTION: DEFAMATION (LIBEL)

Plaintiff incorporates by reference all preceding paragraphs.

Defendants published false and defamatory statements about Plaintiff Shannon Bitzer, specifically portraying Plaintiff as a "violent" participant in the January 6, 2021, events, in the article referenced above.

The statements were presented as fact, not opinion, and were published to a wide audience via WBIR's website.

The statements were false, as evidenced by:

- a. Video footage in Plaintiff's possession, showing Plaintiff chanting peacefully on January 6, 2021, without any evidence of violent assault(s).
- b. Court records from the U.S. District Court for the District of Columbia, confirming Plaintiff's acquittal of all charges.
- c. Further, Plaintiff has no history of criminal behavior on record, and was honorably discharged from the US Marine Corps in 2010.

Defendants acted with actual malice, knowing the statements were false or with reckless disregard for their truth, by selectively using still images to misrepresent Plaintiff's conduct and failing to acknowledge Plaintiff's acquittal, despite access to contradictory video evidence and public court records.

As a direct and proximate result of Defendants' actions, Plaintiff has suffered reputational harm, emotional distress, and economic loss, including lost employment and business opportunities.

The false statements constitute defamation per se, as they accuse Plaintiff of criminal and violent conduct, inherently damaging Plaintiff's reputation.

VI. PRAYER FOR RELIEF

WHEREFORE, Plaintiff Shannon Bitzer respectfully requests the following relief:

- a. Compensatory damages in an amount to be determined at trial, but not less than \$848,000 for reputational harm, emotional distress, and economic loss.
- b. Punitive damages to deter Defendants' reckless and malicious conduct, in an amount to be determined at trial.
- c. An injunction requiring Defendants to retract the defamatory article and issue a public correction.
- d. Costs and reasonable court fees.
- e. Such other and further relief as the Court deems just and proper.

DATED: June 8, 2025

Respectfully submitted,

Shannon Bitzer, Pro Se

7322 Wildwood Ct., Knoxville, TN 37920

513-658-1989

SJBitzer@gmail.com

Knox County
Circuit Court

FILED
CHARLES D. SUSANO III
CLERK

STATE OF TENNESSEE
CIVIL SUMMONS

Case Number

1-186-25

page 1 of 1

Shannon Bitzer

vs. WBIR

Served On:

WBIR

KNOX COUNTY CIRCUIT
CIVIL SESSIONS
AND JUVENILE COURTS

Bill

Williams Ave., Knoxville, TN

37917

You are hereby summoned to defend a civil action filed against you in _____ Court, _____ County, Tennessee. Your defense must be made within thirty (30) days from the date this summons is served upon you. You are directed to file your defense with the clerk of the court and send a copy to the plaintiff's attorney at the address listed below. If you fail to defend this action by the below date, judgment by default may be rendered against you for the relief sought in the complaint.

Issued:

June 9, 2025

Charles D. Susano III / ndy
Clerk / Deputy Clerk

Attorney for Plaintiff:

NOTICE OF PERSONAL PROPERTY EXEMPTION

TO THE DEFENDANT(S): Tennessee law provides a ten thousand dollar (\$10,000) personal property exemption as well as a homestead exemption from execution or seizure to satisfy a judgment. The amount of the homestead exemption depends upon your age and the other factors which are listed in TCA § 26-2-301. If a judgment should be entered against you in this action and you wish to claim property as exempt, you must file a written list, under oath, of the items you wish to claim as exempt with the clerk of the court. The list may be filed at any time and may be changed by you thereafter as necessary; however, unless it is filed before the judgment becomes final, it will not be effective as to any execution or garnishment issued prior to the filing of the list. Certain items are automatically exempt by law and do not need to be listed; these include items of necessary wearing apparel (clothing) for your self and your family and trunks or other receptacles necessary to contain such apparel, family portraits, the family Bible, and school books. Should any of these items be seized you would have the right to recover them. If you do not understand your exemption right or how to exercise it, you may wish to seek the counsel of a lawyer. Please state file number on list.

Mail list to _____, _____ Clerk, _____ County

CERTIFICATION (IF APPLICABLE)

I, _____, Clerk of _____ County do certify this to be a true and correct copy of the original summons issued in this case.

Date: _____

Clerk / Deputy Clerk

OFFICER'S RETURN: Please execute this summons and make your return within ninety (90) days of issuance as provided by law.

I certify that I have served this summons together with the complaint as follows: _____

Date: _____

By: _____

Please Print: Officer, Title

Agency Address

Signature

RETURN ON SERVICE OF SUMMONS BY MAIL: I hereby certify and return that on _____, I sent postage prepaid, by registered return receipt mail or certified return receipt mail, a certified copy of the summons and a copy of the complaint in the above styled case, to the defendant _____. On _____ I received the return receipt, which had been signed by _____ on _____. The return receipt is attached to this original summons to be filed by the Court Clerk.

Date: _____

Signature of Plaintiff



ADA
FOR ASSISTANCE CALL
Allison Major
865 / 215-4437 or
TTY: 865 / 215-2497 (receipt on back)
ADA Coordinator / Deputy Clerk (Comm. Expires _____)

ADA: If you need assistance or accommodations because of a disability, please call

ADA Coordinator, at ()

Knox County Circuit Court	STATE OF TENNESSEE FILED: CHARLES D. SUSANO III CLERK CIVIL SUMMONS page 1 of 1	Case Number 1-186-25
Shannon Williams vs. Tegna Inc.		

Served On:

Tegna, Inc.

KNOX COUNTY CIRCUIT

CLERK

AND JUVENILE COURTS

1513 Williams Ave., Knoxville, TN 37917

You are hereby summoned to defend a civil action filed against you in _____ Court, _____ County, Tennessee. Your defense must be made within thirty (30) days from the date this summons is served upon you. You are directed to file your defense with the clerk of the court and send a copy to the plaintiff's attorney at the address listed below. If you fail to defend this action by the below date, judgment by default may be rendered against you for the relief sought in the complaint.

Issued: June 9, 2025

Charles D. Susano III / CLK
Clerk / Deputy Clerk

Attorney for Plaintiff: _____

NOTICE OF PERSONAL PROPERTY EXEMPTION

TO THE DEFENDANT(S): Tennessee law provides a ten thousand dollar (\$10,000) personal property exemption as well as a homestead exemption from execution or seizure to satisfy a judgment. The amount of the homestead exemption depends upon your age and the other factors which are listed in TCA § 26-2-301. If a judgment should be entered against you in this action and you wish to claim property as exempt, you must file a written list, under oath, of the items you wish to claim as exempt with the clerk of the court. The list may be filed at any time and may be changed by you thereafter as necessary; however, unless it is filed before the judgment becomes final, it will not be effective as to any execution or garnishment issued prior to the filing of the list. Certain items are automatically exempt by law and do not need to be listed; these include items of necessary wearing apparel (clothing) for your self and your family and trunks or other receptacles necessary to contain such apparel, family portraits, the family Bible, and school books. Should any of these items be seized you would have the right to recover them. If you do not understand your exemption right or how to exercise it, you may wish to seek the counsel of a lawyer. Please state file number on list.

Mail list to _____, _____ Clerk, _____ County

CERTIFICATION (IF APPLICABLE)

I, _____, Clerk of _____ County do certify this to be a true and correct copy of the original summons issued in this case.

Date: _____

Clerk / Deputy Clerk

OFFICER'S RETURN: Please execute this summons and make your return within ninety (90) days of issuance as provided by law.

I certify that I have served this summons together with the complaint as follows: _____

Date: _____

By: _____
Please Print: Officer, Title

Agency Address

Signature

RETURN ON SERVICE OF SUMMONS BY MAIL: I hereby certify and return that on _____, I sent postage prepaid, by registered return receipt mail or certified return receipt mail, a certified copy of the summons and a copy of the complaint in the above styled case, to the defendant _____. On _____ I received the return receipt, which had been signed by _____ on _____. The return receipt is attached to this original summons to be filed by the Court Clerk.

Date: _____

Signature of Plaintiff



ADA
FOR ASSISTANCE CALL

Allison Major
865 / 215-4437
TTY: 865 / 215-4437

Notary Public / Deputy Clerk (Comm. Expires _____)

Plaintiff's Attorney (or Person Authorized to Serve Process)
Attach return receipt on back)

ADA: If you need assistance or accommodation, please contact Allison Major at 865 / 215-4437 or TTY: 865 / 215-4437.

STATE OF TENNESSEE
CIVIL SUMMONS

Case Number

FILED page 1 of 1

1-186-25

Plaintiff - Shannon Ritter vs. WBR, Tegna Inc., Jane/John Doe

Served On:

Jane Doe

2025 JUN 11 AM 11:32
1513 B. TP Williams Ave., Knoxville, TN 37917KNOX COUNTY CIRCUIT,
CIVIL SESSIONS
AND JUVENILE COURTS

You are hereby summoned to defend a civil action filed against you in _____ Court, _____ County, Tennessee. Your defense must be made within thirty (30) days from the date this summons is served upon you. You are directed to file your defense with the clerk of the court and send a copy to the plaintiff's attorney at the address listed below. If you fail to defend this action by the below date, judgment by default may be rendered against you for the relief sought in the complaint.

Issued: June 9, 2025

Charles D. Sizemore II / WLY
Clerk / Deputy Clerk

Attorney for Plaintiff: _____

NOTICE OF PERSONAL PROPERTY EXEMPTION

TO THE DEFENDANT(S): Tennessee law provides a ten thousand dollar (\$10,000) personal property exemption as well as a homestead exemption from execution or seizure to satisfy a judgment. The amount of the homestead exemption depends upon your age and the other factors which are listed in TCA § 26-2-301. If a judgment should be entered against you in this action and you wish to claim property as exempt, you must file a written list, under oath, of the items you wish to claim as exempt with the clerk of the court. The list may be filed at any time and may be changed by you thereafter as necessary; however, unless it is filed before the judgment becomes final, it will not be effective as to any execution or garnishment issued prior to the filing of the list. Certain items are automatically exempt by law and do not need to be listed; these include items of necessary wearing apparel (clothing) for your self and your family and trunks or other receptacles necessary to contain such apparel, family portraits, the family Bible, and school books. Should any of these items be seized you would have the right to recover them. If you do not understand your exemption right or how to exercise it, you may wish to seek the counsel of a lawyer. Please state file number on list.

Mail list to _____ Clerk, _____ County

CERTIFICATION (IF APPLICABLE)

I, _____ Clerk of _____ County do certify this to be a true and correct copy of the original summons issued in this case.

Date: _____

Clerk / Deputy Clerk

OFFICER'S RETURN: Please execute this summons and make your return within ninety (90) days of issuance as provided by law.

I certify that I have served this summons together with the complaint as follows: _____

Date: _____

By: _____
Please Print: Officer, Title

Agency Address

Signature

RETURN ON SERVICE OF SUMMONS BY MAIL: I hereby certify and return that on _____, I sent postage prepaid, by registered return receipt mail or certified return receipt mail, a certified copy of the summons and a copy of the complaint in the above styled case, to the defendant _____. On _____ I received the return receipt, which had been signed by _____ on _____. The return receipt is attached to this original summons to be filed by the Court Clerk.

Date: _____

Signature of Plaintiff



ADA
FOR ASSISTANCE CALL
Allison Major
865 / 215-4487
TAV 865 / 215-2499
ADA Judicial / Deputy Clerk (Comm. Expires _____)
Attorney (or Person Authorized to Serve Process)
ADA Judicial / Deputy Clerk (Comm. Expires _____)

ADA: If you need assistance or accommodations because of a disability, please call _____ ADA Coordinator, at () _____

**Knox County
Circuit Court**

STATE OF TENNESSEE

Case Number

CIVIL SUMMONS

FILED
CHARLES D. SUSANO II page 1 of 1

1-186-25

Plaintiff - Shannon Bitzer vs. WBIR, Tegna Inc., Jane/John Doe's

2025 JUN -9 AM 10:32

Served On:

John Doe

1513 KNOX BILLY WILLIAMS Ave., Knoxville, TN 37917

CIVIL SESSIONS
AND JUVENILE COURTS

You are hereby summoned to defend a civil action filed against you in _____ Court, _____ County, Tennessee. Your defense must be made within thirty (30) days from the date this summons is served upon you. You are directed to file your defense with the clerk of the court and send a copy to the plaintiff's attorney at the address listed below. If you fail to defend this action by the below date, judgment by default may be rendered against you for the relief sought in the complaint.

Issued: June 9, 2025

Charles D. Susano II
Clerk / Deputy Clerk

Attorney for Plaintiff:

NOTICE OF PERSONAL PROPERTY EXEMPTION

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Mail list to _____, Clerk, _____ County

CERTIFICATION (IF APPLICABLE)

I, _____, Clerk of _____ County do certify this to be a true and correct copy of the original summons issued in this case.

Date: _____

Clerk / Deputy Clerk

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Date: _____

By: _____

Please Print: Officer, Title

Agency Address

Signature

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Date: _____



ADA

FOR ASSISTANCE CALL _____ Notary Public / Deputy Clerk (Comm. Expires _____)

Allison Major
865 / 215-4437 or

TTY: 865 / 215-2497 Plaintiff's Attorney (or Person Authorized to Serve Process)

Signature of Plaintiff

Ada.judicial@knoxcounty.org (print on back)

ADA: If you need assistance or accommodations because of a disability, please call _____, ADA Coordinator, at () _____

Knox County
Circuit Court

STATE OF TENNESSEE
CIVIL SUMMONS

Case Number

FILED page 1 of 1

1-186-25

Plaintiff - Shannon Britzer vs. WBR, Tegna Inc., Jane/John Doe

Served On:

Jane Doe

2025 JUN 13 8:19 AM
1513 B. TP Williams Ave., Knoxville TN 37917

KNOX COUNTY CIRCUIT,
CIVIL SESSIONS
AND JUVENILE COURTS

You are hereby summoned to defend a civil action filed against you in _____ Court, _____ County, Tennessee. Your defense must be made within thirty (30) days from the date this summons is served upon you. You are directed to file your defense with the clerk of the court and send a copy to the plaintiff's attorney at the address listed below. If you fail to defend this action by the below date, judgment by default may be rendered against you for the relief sought in the complaint.

Issued: June 9, 2025

Charles D. Susmano
Clerk / Deputy Clerk

Attorney for Plaintiff:

NOTICE OF PERSONAL PROPERTY EXEMPTION

TO THE DEFENDANT(S): Tennessee law provides a ten thousand dollar (\$10,000) personal property exemption as well as a homestead exemption from execution or seizure to satisfy a judgment. The amount of the homestead exemption depends upon your age and the other factors which are listed in TCA § 26-2-301. If a judgment should be entered against you in this action and you wish to claim property as exempt, you must file a written list, under oath, of the items you wish to claim as exempt with the clerk of the court. The list may be filed at any time and may be changed by you thereafter as necessary; however, unless it is filed before the judgment becomes final, it will not be effective as to any execution or garnishment issued prior to the filing of the list. Certain items are automatically exempt by law and do not need to be listed; these include items of necessary wearing apparel (clothing) for you and your family and trunks or other receptacles necessary to contain such apparel, family portraits, the family Bible, and school books. Should any of these items be seized you would have the right to recover them. If you do not understand your exemption right or how to exercise it, you may wish to seek the counsel of a lawyer. Please state file number on list.

Mail list to _____ Clerk, _____ County

CERTIFICATION (IF APPLICABLE)

I, _____ Clerk of _____ County do certify this to be a true and correct copy of the original summons issued in this case.

Date: _____

Clerk / Deputy Clerk

OFFICER'S RETURN: Please execute this summons and make your return within ninety (90) days of issuance as provided by law.

I certify that I have served this summons together with the complaint as follows: NOT TO BE FOUND IN MY COUNTRY

Date: 6-13-25

By: B. Crowell #2742 KCHO
Please Print: Officer, Title

B. Crowell #2742 KCHO
Signature

Agency Address

RETURN ON SERVICE OF SUMMONS BY MAIL: I hereby certify and return that on _____ I sent postage prepaid, by registered return receipt mail or certified return receipt mail, a certified copy of the summons and a copy of the complaint in the above styled case, to the defendant _____. On _____ I received the return receipt, which had been signed by _____ on _____. The return receipt is attached to this original summons to be filed by the Court Clerk.

Date: _____
ADA: _____ Public / Deputy Clerk (Comm. Expires _____)

Signature of Plaintiff

FOR ASSISTANCE CALL
Allison Major
865 / 215-4487
ADA Coordinator (or Person Authorized to Serve Process)
865 / 215-2400
ADA Coordinator, at ()

ADA: If you need assistance or accommodations because of a disability, please call _____

Knox County
Circuit Court

2125
STATE OF TENNESSEE

Case Number

FILED
CIVIL SUMMONS

CHARLES D. SUSANO II page 1 of 1

1-186-25

Plaintiff - Shannon Bitzer vs. WBR, Tegna Inc., Jane/John Doe's

2025 JUN -9 AM 10:32

Served On:

John Doe

1513 KNOX BILLY WILLIAMS Ave., Knoxville, TN 37917

CLERK SESSIONS
AND JUVENILE COURTS

You are hereby summoned to defend a civil action filed against you in _____ Court, _____ County, Tennessee. Your defense must be made within thirty (30) days from the date this summons is served upon you. You are directed to file your defense with the clerk of the court and send a copy to the plaintiff's attorney at the address listed below. If you fail to defend this action by the below date, judgment by default may be rendered against you for the relief sought in the complaint.

Issued: June 9, 2025

Charles D. Susano II
Clerk / Deputy Clerk

Attorney for Plaintiff:

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Mail list to _____ Clerk, _____ County

CERTIFICATION (IF APPLICABLE)

I, _____ Clerk of _____ County do certify this to be a true and correct copy of the original summons issued in this case.

Date: _____

Clerk / Deputy Clerk

OFFICER'S RETURN: Please execute this summons and make your return within ninety (90) days of issuance as provided by law.

I certify that I have served this summons together with the complaint as follows: NOT TO BE FOUND IN MY COUNTRY

Date: 6-13-25 vub0

By: R. Crowell # 2742 KCB0

Please Print: Officer, Title

R. Crowell # 2742 KCB0

Signature

Agency Address

RETURN ON SERVICE OF SUMMONS BY MAIL: I hereby certify and return that on _____ I sent postage prepaid, by registered return receipt mail or certified return receipt mail, a certified copy of the summons and a copy of the complaint in the above styled case, to the defendant _____. On _____ I received the return receipt, which had been signed by _____ on _____. The return receipt is attached to this original summons to be filed by the Court Clerk.

Date: _____

Signature of Plaintiff



ADA

FOR ASSISTANCE CALL

Allison Major

865 / 215-4437 or

TTY: 865 / 215-2489

Notary Public / Deputy Clerk (Comm. Expires _____)

Plaintiff's Attorney (or Person Authorized to Serve Process)

Ada Judicial Center (on back)

ADA: If you need assistance or accommodations because of a disability, please call _____, ADA Coordinator, at () _____.

IN THE CIRCUIT COURT OF KNOX COUNTY, TENNESSEE

SHANNON BITZER,

Plaintiff,

v.

JOURNALIST JANE/JOHN DOE, WBIR, and TEGNA INC.,

Defendants.

Case No.: 1-186-25

FILED
2024 JUN 16 10:02
CLERK OF COURT
AND JUDICIAL OFFICES

FIRST AMENDED COMPLAINT FOR DEFAMATION (LIBEL)

COMES NOW the Plaintiff, Shannon Bitzer, pro se, and files this First Amended Complaint against Defendants Journalist Jane/John Doe, WBIR, and Tegna Inc., pursuant to Tennessee Rules of Civil Procedure, Rule 15.01. This amendment rectifies the publication date of the defamatory article from “about July 2024” to August 5, 2024, and underscores that Plaintiff was never charged with insurrection, contrary to the article’s baseless claim of “January 6 Insurrection Charges”.

<https://www.wbir.com/article/news/crime/shannon-bitzer-facing-january-6-insurrection-charges/51-223bd6d7-a785-4253-b309-9f9c671217f7>.

Plaintiff alleges as follows:

I. INTRODUCTION

This action for defamation (libel) arises from a maliciously false article published by Defendants on August 5, 2024, titled “Shannon Bitzer Facing January 6 Insurrection Charges,” which

branded Plaintiff as a violent participant in an “insurrection” on January 6, 2021—a term implying treasonous intent under 18 U.S.C. § 2384, yet Plaintiff faced no such charge, as evidenced by Plaintiff’s acquittal on February 17, 2025. Defendants’ libel, disseminated to a vast audience via WBIR’s website, inflicted catastrophic reputational harm, economic devastation, and profound emotional distress, undermining Plaintiff’s standing as a high profile C-level executive in the hemp industry, and subjecting Plaintiff to public vilification.

The original complaint, filed on June 9, 2025, contained a minor, non-specific error regarding the publication date, which this amendment corrects to August 5, 2024. This amendment also clarifies the article’s false “insurrection” label, ensuring the record reflects Plaintiff’s innocence and Defendants’ reckless disregard for truth.

II. PARTIES

Plaintiff Shannon Bitzer is an individual residing at 7322 Wildwood Ct., Knoxville, Tennessee 37920, honorably discharged from the U.S. Marine Corps in 2010, and a respected entrepreneur in the hemp industry until Defendants’ falsehoods shattered Plaintiff’s reputation.

Defendant Journalist Jane/John Doe is an individual employed by WBIR, author of the defamatory article. Plaintiff has diligently sought Defendant’s true name through review of WBIR’s publication and direct inquiries but has not yet identified the individual. Plaintiff will further amend upon ascertaining the name, as required by due diligence.

Defendant WBIR is a television station headquartered at 1513 Bill Williams Avenue, Knoxville, Tennessee 37917, owned by Tegna Inc., which published the libelous article on its website.

Defendant Tegna Inc. is a corporation headquartered at 8350 Broad Street, Suite 2000, Tysons, Virginia 22102, the parent company of WBIR, exercising editorial control and bearing responsibility for its subsidiary's reckless publications.

III. JURISDICTION AND VENUE

This Court possesses jurisdiction pursuant to Tenn. Code Ann. § 16-10-101, as Defendants' defamatory publication occurred in Knox County, Tennessee, inflicting harm upon Plaintiff within this jurisdiction.

Venue is proper in Knox County under Tenn. Code Ann. § 20-4-101, as WBIR operates, and Jane/John Doe is employed, in Knoxville, and the libelous article was published and accessed here.

IV. FACTUAL ALLEGATIONS

On January 6, 2021, Plaintiff attended an event at the U.S. Capitol in Washington, D.C., engaging in protected speech—without committing violence, injury, or property damage. Plaintiff's actions were constitutionally protected expressions of dissent, not the criminal acts Defendants alleged.

Plaintiff faced initial misdemeanor charges related to January 6, 2021, which escalated to felonies after Plaintiff declined to cooperate with authorities. On February 17, 2025, Plaintiff was acquitted of all charges in the U.S. District Court for the District of Columbia, Case No. 24-cr-00316, with no convictions, nor evidence of assault, and no charge of insurrection or seditious conspiracy ever leveled against Plaintiff.

On August 5, 2024, Defendants published the aforementioned article, falsely claiming Plaintiff faced “January 6 Insurrection Charges,” a term implying Plaintiff was accused of a grave, treasonous offense akin to seditious conspiracy under 18 U.S.C. § 2384—an accusation wholly absent from Plaintiff’s record.

The article employed selective still images to depict Plaintiff as a violent participant, ignoring publicly available Capitol security footage, timestamped January 6, 2021, 3:15–4:30 PM, which shows Plaintiff chanting peacefully, and gesturally displaced a stanchion, contradicting Defendants’ narrative.

Plaintiff’s acquittal records, publicly accessible from Case No. 24-cr-00316, confirm no convictions, and no insurrection charges, rendering Defendants’ portrayal patently false.

Defendants acted with actual malice, knowing their portrayal was false or with reckless disregard for its truth- commonly seen with J6 cases. Defendants had access to Capitol footage and acquittal records but chose misleading images and the inflammatory “insurrection” label, demonstrating a deliberate intent to harm Plaintiff’s reputation.

The article's dissemination to a global audience via WBIR's website inflicted irreparable damages, including:

Economic Loss: \$54,000 paid to Plaintiff's brother to assume Plaintiff's role in a hemp business until May 2025, protecting the business from Plaintiff's stigmatized identity.

\$174,000 in lost personal salary, based on Plaintiff's prior \$120,000 annual income as a C-level executive at a \$25MM company, plus remittance of salary given to Plaintiff's brother, as Plaintiff refrained from drawing income to safeguard the business.

\$26,000 in diminished valuation and lost opportunities of Plaintiff's hemp business, reflecting industry bias against January 6th participants and Plaintiff's tarnished reputation in a left-leaning market.

\$2,000 in lost time for therapy sessions, for post-traumatic stress disorder (PTSD), incurred through sessions with Roderick Lewis, LCP/MHSP, since August 2024.

Reputational Damage: \$500,000 minimum estimated loss, due to blackballing as a C-level executive in the hemp industry, forcing Plaintiff to use aliases to network and face rejections from opportunities and partnerships.

Emotional Distress: \$92,000 for profound anguish, including persecutory nightmares, social ostracism, psychological trauma, and need for prescribed medications (Fluoxetine, Cyclobenzaprine, Propranolol), exacerbated by public vilification and industry exclusion.

V. CAUSE OF ACTION: DEFAMATION (LIBEL)

Plaintiff incorporates all preceding paragraphs as if fully set forth herein.

Defendants published false and defamatory statements, branding Plaintiff a violent participant in a January 6 “insurrection,” presented as fact on WBIR’s website, accessible to millions.

The statements were false, as evidenced by:

Capitol footage showing Plaintiff’s lawful chanting and protest. The plaintiff is even heard on camera asking an officer, “are you okay?”, due to overcrowding. The officer responded, “Yeah”.

Acquittal records (Case No. 24-cr-00316) confirming no convictions or insurrection charges.

Plaintiff’s clean criminal record and honorable discharge from the U.S. Marine Corps (2010).

Defendants acted with actual malice, ignoring public footage and acquittal records, and using “insurrection” to falsely imply treasonous conduct, knowing Plaintiff faced no such charge.

As a direct and proximate result, Plaintiff suffered catastrophic damages outlined in \$848,000 (paragraph 15a–f), constituting defamation per se by accusing Plaintiff of criminal conduct, inherently damaging reputation.

VI. PRAYER FOR RELIEF

WHEREFORE, Plaintiff Shannon Bitzer, standing as a beacon against politically motivated, journalistic malfeasance, demands:

Compensatory damages of \$848,000, reflecting:

\$54,000 (brother's salary).

\$174,000 (lost salary).

\$26,000 (business valuation loss).

\$2,000 (therapy sessions and related medical).

\$500,000 (reputational damage).

\$92,000 (emotional distress).

Punitive damages to deter Defendants' reckless disregard for truth.

An injunction mandating retraction and a public correction of the defamatory article.

Costs and fees.

Such other relief as justice demands.

DATED: June 16, 2025

Respectfully submitted,

Shannon Bitzer, Pro Se

7322 Wildwood Ct., Knoxville, TN 37920

Phone: 513-658-2589

Email: SJBitzer@gmail.com

<u>Knox County</u> <u>Circuit Court</u>	STATE OF TENNESSEE FILED CHARLES D. SASSANO CLERK page 1 of 1	Case Number <u>1-186-25</u>
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Shannon Bitzer vs. Jane / John Doe, WBIR, Tegna Inc
1513 Bill Williams Ave. Knoxville TN 3791

Served On:

WBIR

KNOX COUNTY CIRCUIT,
CIVIL SESSIONS
AND JUVENILE COURTS

Civil Court, Knox County, Tennessee.

You are hereby summoned to defend a civil action filed against you in _____ Court, _____ County, Tennessee. Your defense must be made within thirty (30) days from the date this summons is served upon you. You are directed to file your defense with the clerk of the court and send a copy to the plaintiff's attorney at the address listed below. If you fail to defend this action by the below date, judgment by default may be rendered against you for the relief sought in the complaint.

Issued: June 16, 2025

Charles D. Sassano III
Clerk / Deputy Clerk

Attorney for Plaintiff:

Shannon Bitzer Pro Se By Eke
7322 Wildwood Ct. Knoxville TN 37920 513-658-1989

NOTICE OF PERSONAL PROPERTY EXEMPTION

TO THE DEFENDANT(S): Tennessee law provides a ten thousand dollar (\$10,000) personal property exemption as well as a homestead exemption from execution or seizure to satisfy a judgment. The amount of the homestead exemption depends upon your age and the other factors which are listed in TCA § 26-2-301. If a judgment should be entered against you in this action and you wish to claim property as exempt, you must file a written list, under oath, of the items you wish to claim as exempt with the clerk of the court. The list may be filed at any time and may be changed by you thereafter as necessary; however, unless it is filed before the judgment becomes final, it will not be effective as to any execution or garnishment issued prior to the filing of the list. Certain items are automatically exempt by law and do not need to be listed; these include items of necessary wearing apparel (clothing) for your self and your family and trunks or other receptacles necessary to contain such apparel, family portraits, the family Bible, and school books. Should any of these items be seized you would have the right to recover them. If you do not understand your exemption right or how to exercise it, you may wish to seek the counsel of a lawyer. Please state file number on list.

Mail list to _____ Clerk, _____ County

CERTIFICATION (IF APPLICABLE)

I, _____ Clerk of _____ County do certify this to be a true and correct copy of the original summons issued in this case.

Date: _____

Clerk / Deputy Clerk

OFFICER'S RETURN: Please execute this summons and make your return within ninety (90) days of issuance as provided by law.

I certify that I have served this summons together with the complaint as follows: _____

Date: _____

By: _____

Please Print: Officer, Title

Agency Address

Signature

RETURN ON SERVICE OF SUMMONS BY MAIL: I hereby certify and return that on _____, I sent postage prepaid, by registered return receipt mail or certified return receipt mail, a certified copy of the summons and a copy of the complaint in the above styled case, to the defendant _____. On _____ I received the return receipt, which had been signed by _____ on _____. The return receipt is attached to this original summons to be filed by the Court Clerk.

Date: _____

Notary Public / Deputy Clerk (Comm. Expires _____)

Signature of Plaintiff

Plaintiff's Attorney (or Person Authorized to Serve Process)

(Attach return receipt on back) **FOR ASSISTANCE CALL**

ADA: If you need assistance or accommodations because of a disability, please call

865-1215-4437 or 865-1215-2297

Knox County
Circuit Court

STATE OF TENNESSEE
CIVIL SUMMONS

Case Number

1-186-25

CHARLES D. SUSANETT
page 1 of 1

Shannon Bitzer vs. Jane / John De, WBR, Tegna Inc.

2025 JUN 18 SAT 11:29 AM Williams Ave. Knoxville TN 37917

Served On:

Tegna, Inc.

KNOX COUNTY CIRCUIT
CIVIL SESSIONS
AND JUVENILE COURTS

You are hereby summoned to defend a civil action filed against you in Civil Court, Knox County, Tennessee. Your defense must be made within thirty (30) days from the date this summons is served upon you. You are directed to file your defense with the clerk of the court and send a copy to the plaintiff's attorney at the address listed below. If you fail to defend this action by the below date, judgment by default may be rendered against you for the relief sought in the complaint.

Issued: June 16, 2025

Charles D. Susanett
Clerk / Deputy Clerk

Attorney for Plaintiff: Shannon Bitzer, Pro Se

7322 Wildwood Ct., Knoxville TN 37920 513-650-1989

NOTICE OF PERSONAL PROPERTY EXEMPTION

TO THE DEFENDANT(S). Tennessee law provides a ten thousand dollar (\$10,000) personal property exemption as well as a homestead exemption from execution or seizure to satisfy a judgment. The amount of the homestead exemption depends upon your age and the other factors which are listed in TCA § 26-2-301. If a judgment should be entered against you in this action and you wish to claim property as exempt, you must file a written list, under oath, of the items you wish to claim as exempt with the clerk of the court. The list may be filed at any time and may be changed by you thereafter as necessary; however, unless it is filed before the judgment becomes final, it will not be effective as to any execution or garnishment issued prior to the filing of the list. Certain items are automatically exempt by law and do not need to be listed; these include items of necessary wearing apparel (clothing) for your self and your family and trunks or other receptacles necessary to contain such apparel, family portraits, the family Bible, and school books. Should any of these items be seized you would have the right to recover them. If you do not understand your exemption right or how to exercise it, you may wish to seek the counsel of a lawyer. Please state file number on list

Mail list to _____ Clerk, _____ County

CERTIFICATION (IF APPLICABLE)

I, _____ Clerk of _____ County do certify this to be a true and correct copy of the original summons issued in this case.

Date: _____

Clerk / Deputy Clerk

OFFICER'S RETURN: Please execute this summons and make your return within ninety (90) days of issuance as provided by law.

I certify that I have served this summons together with the complaint as follows: _____

Date: _____

By: _____

Please Print: Officer, Title

Agency Address _____

Signature _____

RETURN ON SERVICE OF SUMMONS BY MAIL: I hereby certify and return that on _____, I sent postage prepaid, by registered return receipt mail or certified return receipt mail, a certified copy of the summons and a copy of the complaint in the above styled case, to the defendant _____. On _____ I received the return receipt, which had been signed by _____ on _____. The return receipt is attached to this original summons to be filed by the Court Clerk.

Date: _____

Notary Public / Deputy Clerk (Comm. Expires _____)

Signature of Plaintiff _____

Plaintiff's Attorney (Person Authorized to Serve Process)

(Attach return receipt on back of summons)

ADA: If you need assistance or accommodations because of a disability, please call TTY: 865/215-2492 ADA Coordinator, at ()

**Knox County
Circuit Court**

STATE OF TENNESSEE

Case Number

FILED
CHARLES D. SUSANOTT
CLERK

CIVIL SUMMONS

page 1 of 1

1-186-25

Shannon Bitzer vs. John Doe, WBR, Tegna, Inc.

Served On:

Jane Doe

KNOX COUNTY CIRCUIT
CIVIL SESSIONS
AND JUVENILE COURTS

1513 Bill Williams A
Knoxville, TN 379

You are hereby summoned to defend a civil action filed against you in Civil Court, Knox County, Tennessee. Your defense must be made within thirty (30) days from the date this summons is served upon you. You are directed to file your defense with the clerk of the court and send a copy to the plaintiff's attorney at the address listed below. If you fail to defend this action by the below date, judgment by default may be rendered against you for the relief sought in the complaint.

Issued: June 16, 2025

Charles D. Susanott
Clerk / Deputy Clerk

Attorney for Plaintiff:

Shannon Bitzer Pro Se
7322 Wildwood Ct, Knoxville, TN 37920 513-658-1989

NOTICE OF PERSONAL PROPERTY EXEMPTION

TO THE DEFENDANT(S): Tennessee law provides a ten thousand dollar (\$10,000) personal property exemption as well as a homestead exemption from execution or seizure to satisfy a judgment. The amount of the homestead exemption depends upon your age and the other factors which are listed in TCA § 26-2-301. If a judgment should be entered against you in this action and you wish to claim property as exempt, you must file a written list, under oath, of the items you wish to claim as exempt with the clerk of the court. The list may be filed at any time and may be changed by you thereafter as necessary; however, unless it is filed before the judgment becomes final, it will not be effective as to any execution or garnishment issued prior to the filing of the list. Certain items are automatically exempt by law and do not need to be listed; these include items of necessary wearing apparel (clothing) for your self and your family and trunks or other receptacles necessary to contain such apparel, family portraits, the family Bible, and school books. Should any of these items be seized you would have the right to recover them. If you do not understand your exemption right or how to exercise it, you may wish to seek the counsel of a lawyer. Please state file number on list.

Mail list to _____ Clerk, _____ County

CERTIFICATION (IF APPLICABLE)

I, _____ Clerk of _____ County do certify this to be a true and correct copy of the original summons issued in this case.

Date: _____

Clerk / Deputy Clerk

OFFICER'S RETURN: Please execute this summons and make your return within ninety (90) days of issuance as provided by law.

I certify that I have served this summons together with the complaint as follows: _____

Date: _____

By: _____

Please Print: Officer, Title

Agency Address

Signature

RETURN ON SERVICE OF SUMMONS BY MAIL: I hereby certify and return that on _____, I sent postage prepaid, by registered return receipt mail or certified return receipt mail, a certified copy of the summons and a copy of the complaint in the above styled case, to the defendant _____. On _____ I received the return receipt, which had been signed by _____ on _____. The return receipt is attached to this original summons to be filed by the Court Clerk.

Date: _____

Notary Public / Deputy Clerk (Comm. Expires _____)

Signature of Plaintiff

Plaintiff's Attorney (or Person Authorized to Serve Process)

(Attach return receipt or back)

ADA: If you need assistance or accommodations because of a disability, please call 865/215-4407 or 865/215-2497. ADA Coordinator, at ()

Knox County
Circuit Court

STATE OF TENNESSEE

CIVIL SUMMONS

Case Number

1-186-25

page 1 of 1

Shannon Bitzer 2025 JUN 16 WILDER, Tegna Inc., Jane/John Doe

Served On:

John Doe

1513
KNOX COUNTY CIRCUIT,
CIVIL SESSIONS
AND JUVENILE COURTS

Bill Williams Ave.

Knoxville TN 37917

You are hereby summoned to defend a civil action filed against you in Civil Court, Knox County, Tennessee. Your defense must be made within thirty (30) days from the date this summons is served upon you. You are directed to file your defense with the clerk of the court and send a copy to the plaintiff's attorney at the address listed below. If you fail to defend this action by the below date, judgment by default may be rendered against you for the relief sought in the complaint.

Issued: June 16, 2025

Charles D. Searns III
Clerk / Deputy Clerk

Attorney for Plaintiff:

Shannon Bitzer Pro Se
7322 Wildwood Ct., Knoxville TN 37920 513-658-1989

NOTICE OF PERSONAL PROPERTY EXEMPTION

TO THE DEFENDANT(S): Tennessee law provides a ten thousand dollar (\$10,000) personal property exemption as well as a homestead exemption from execution or seizure to satisfy a judgment. The amount of the homestead exemption depends upon your age and the other factors which are listed in TCA § 26-2-301. If a judgment should be entered against you in this action and you wish to claim property as exempt, you must file a written list, under oath, of the items you wish to claim as exempt with the clerk of the court. The list may be filed at any time and may be changed by you thereafter as necessary; however, unless it is filed before the judgment becomes final, it will not be effective as to any execution or garnishment issued prior to the filing of the list. Certain items are automatically exempt by law and do not need to be listed; these include items of necessary wearing apparel (clothing) for your self and your family and trunks or other receptacles necessary to contain such apparel, family portraits, the family Bible, and school books. Should any of these items be seized you would have the right to recover them. If you do not understand your exemption right or how to exercise it, you may wish to seek the counsel of a lawyer. Please state file number on list.

Mail list to _____, Clerk, _____ County

CERTIFICATION (IF APPLICABLE)

I, _____, Clerk of _____ County do certify this to be a true and correct copy of the original summons issued in this case.

Date: _____

Clerk / Deputy Clerk

OFFICER'S RETURN: Please execute this summons and make your return within ninety (90) days of issuance as provided by law.

I certify that I have served this summons together with the complaint as follows: _____

Date: _____

By: _____

Please Print: Officer, Title

Agency Address _____

Signature _____

RETURN ON SERVICE OF SUMMONS BY MAIL: I hereby certify and return that on _____, I sent postage prepaid, by registered return receipt mail or certified return receipt mail, a certified copy of the summons and a copy of the complaint in the above styled case, to the defendant _____. On _____ I received the return receipt, which had been signed by _____ on _____. The return receipt is attached to this original summons to be filed by the Court Clerk.

Date: _____

Notary Public / Deputy Clerk (Comm. Expires _____)

Signature of Plaintiff _____

Plaintiff's Attorney (or Person Authorized to Serve Process)

(Attach return receipt on FOR ASSISTANCE CALL

ADA: If you need assistance or accommodations because of a disability, please call 865/215-4437 or ADA Coordinator, at () _____

Knox County Circuit Court FILED CHARLES D. SUSANO III CLERK	212521 STATE OF TENNESSEE CIVIL SUMMONS page 1 of 1	Case Number 1-186-25
Shannon Bitzer vs. WBIR		

Served On: WBIR KNOX COUNTY CIRCUIT CIVIL SESSIONS AND JUVENILE COURTS Bill Williams Ave., Knoxville, TN 37917

You are hereby summoned to defend a civil action filed against you in _____ Court, _____ County, Tennessee. Your defense must be made within thirty (30) days from the date this summons is served upon you. You are directed to file your defense with the clerk of the court and send a copy to the plaintiff's attorney at the address listed below. If you fail to defend this action by the below date, judgment by default may be rendered against you for the relief sought in the complaint.

Issued: June 9, 2025 Charles D. Susano III / nk
 Clerk / Deputy Clerk

Attorney for Plaintiff: _____

NOTICE OF PERSONAL PROPERTY EXEMPTION

TO THE DEFENDANT(S): Tennessee law provides a ten thousand dollar (\$10,000) personal property exemption as well as a homestead exemption from execution or seizure to satisfy a judgment. The amount of the homestead exemption depends upon your age and the other factors which are listed in TCA § 26-2-301. If a judgment should be entered against you in this action and you wish to claim property as exempt, you must file a written list, under oath, of the items you wish to claim as exempt with the clerk of the court. The list may be filed at any time and may be changed by you thereafter as necessary; however, unless it is filed before the judgment becomes final, it will not be effective as to any execution or garnishment issued prior to the filing of the list. Certain items are automatically exempt by law and do not need to be listed; these include items of necessary wearing apparel (clothing) for your self and your family and trunks or other receptacles necessary to contain such apparel, family portraits, the family Bible, and school books. Should any of these items be seized you would have the right to recover them. If you do not understand your exemption right or how to exercise it, you may wish to seek the counsel of a lawyer. Please state file number on list.

Mail list to _____ Clerk, _____ County

CERTIFICATION (IF APPLICABLE)

I, _____ Clerk of _____ County do certify this to be a true and correct copy of the original summons issued in this case.

Date: _____
 Clerk / Deputy Clerk

OFFICER'S RETURN: Please execute this summons and make your return within ninety (90) days of issuance as provided by law.

I certify that I have served this summons together with the complaint as follows: @ 1513 Bill Williams Ave
WBIR David Hunt

Date: 6/16/25 By: JAMES Cox 2510
WCSO Please Print: Officer, Title
 Agency Address Signature JA Cox 2510

RETURN ON SERVICE OF SUMMONS BY MAIL: I hereby certify and return that on _____, I sent postage prepaid, by registered return receipt mail or certified return receipt mail, a certified copy of the summons and a copy of the complaint in the above styled case, to the defendant _____. On _____ I received the return receipt, which had been signed by _____ on _____. The return receipt is attached to this original summons to be filed by the Court Clerk.

Date: _____

Signature of Plaintiff _____

ADA FOR ASSISTANCE CALL Allison Major 865 / 215-4487
 ADA Coordinator, at ()

Knox County Circuit Court	STATE OF TENNESSEE CIVIL SUMMONS page 1 of 1	Case Number 1-186-25
Shannon B. Turner vs. Tegna Inc.		

Served On: Tegna, Inc. 1513 Bill Williams Ave., Knoxville, TN 37917

You are hereby summoned to defend a civil action filed against you in _____ Court, _____ County, Tennessee. Your defense must be made within thirty (30) days from the date this summons is served upon you. You are directed to file your defense with the clerk of the court and send a copy to the plaintiff's attorney at the address listed below. If you fail to defend this action by the below date, judgment by default may be rendered against you for the relief sought in the complaint.

Issued: June 9, 2025 Charles D. Susano III
Clerk / Deputy Clerk

Attorney for Plaintiff: _____

NOTICE OF PERSONAL PROPERTY EXEMPTION

TO THE DEFENDANT(S): Tennessee law provides a ten thousand dollar (\$10,000) personal property exemption as well as a homestead exemption from execution or seizure to satisfy a judgment. The amount of the homestead exemption depends upon your age and the other factors which are listed in TCA § 26-2-301. If a judgment should be entered against you in this action and you wish to claim property as exempt, you must file a written list, under oath, of the items you wish to claim as exempt with the clerk of the court. The list may be filed at any time and may be changed by you thereafter as necessary; however, unless it is filed before the judgment becomes final, it will not be effective as to any execution or garnishment issued prior to the filing of the list. Certain items are automatically exempt by law and do not need to be listed; these include items of necessary wearing apparel (clothing) for your self and your family and trunks or other receptacles necessary to contain such apparel, family portraits, the family Bible, and school books. Should any of these items be seized you would have the right to recover them. If you do not understand your exemption right or how to exercise it, you may wish to seek the counsel of a lawyer. Please state file number on list.

Mail list to _____ Clerk, _____ County

CERTIFICATION (IF APPLICABLE)

I, _____ Clerk of _____ County do certify this to be a true and correct copy of the original summons issued in this case.

Date: _____
Clerk / Deputy Clerk

OFFICER'S RETURN: Please execute this summons and make your return within ninety (90) days of issuance as provided by law.

I certify that I have served this summons together with the complaint as follows:

to Tegna, Inc

Date: 6/16/25

KCSO
Agency Address

@ 1513 Bill Williams Ave
X David Hunt

By: JAMES COX 2510

Please Print: Officer, Title

JAC 2510
Signature

RETURN ON SERVICE OF SUMMONS BY MAIL: I hereby certify and return that on _____, I sent postage prepaid, by registered return receipt mail or certified return receipt mail, a certified copy of the summons and a copy of the complaint in the above styled case, to the defendant _____. On _____ I received the return receipt, which had been signed by _____ on _____. The return receipt is attached to this original summons to be filed by the Court Clerk.

Date: _____
Notary Public / Deputy Clerk (Comm. Expires _____)

Signature of Plaintiff



ADA
FOR ASSISTANCE CALL
Allison Major
865 / 215-4437
TTY: 865 / 215-4437

Notary Public / Deputy Clerk (Comm. Expires _____)

Plaintiff's Attorney (or Person Authorized to Serve Process)

(Attach return receipt on back)

ADA: If you need assistance or accommodation, call ada.judicial@knoxcounty.org

ADA Coordinator, at () _____

Knox County
Circuit Court

STATE OF TENNESSEE
CIVIL SUMMONS

Case Number

1-186-25

CHARLES D. SUSANA III
page 1 of 1

Shannon Bitzer vs. Jane / John Doe, WBR, Tegna Inc.

2025 JUN 18 5:21 PM 11328 Williams Ave. Knoxville TN 37917

Served On:

Tegna, Inc.

KNOX COUNTY CIRCUIT
CIVIL SESSIONS
AND JUVENILE COURTS

You are hereby summoned to defend a civil action filed against you in Civil Court, Knox County, Tennessee. Your defense must be made within thirty (30) days from the date this summons is served upon you. You are directed to file your defense with the clerk of the court and send a copy to the plaintiff's attorney at the address listed below. If you fail to defend this action by the below date, judgment by default may be rendered against you for the relief sought in the complaint.

Issued: June 16, 2025

Charles D. Susana III
Clerk / Deputy Clerk

Attorney for Plaintiff:

Shannon Bitzer, Pro Se
7322 Wildwood Ct., Knoxville TN 37920 513-658-1989

NOTICE OF PERSONAL PROPERTY EXEMPTION

TO THE DEFENDANT(S): Tennessee law provides a ten thousand dollar (\$10,000) personal property exemption as well as a homestead exemption from execution or seizure to satisfy a judgment. The amount of the homestead exemption depends upon your age and the other factors which are listed in TCA § 26-2-301. If a judgment should be entered against you in this action and you wish to claim property as exempt, you must file a written list, under oath, of the items you wish to claim as exempt with the clerk of the court. The list may be filed at any time and may be changed by you thereafter as necessary; however, unless it is filed before the judgment becomes final, it will not be effective as to any execution or garnishment issued prior to the filing of the list. Certain items are automatically exempt by law and do not need to be listed: these include items of necessary wearing apparel (clothing) for your self and your family and trunks or other receptacles necessary to contain such apparel, family portraits, the family Bible, and school books. Should any of these items be seized you would have the right to recover them. If you do not understand your exemption right or how to exercise it, you may wish to seek the counsel of a lawyer. Please state file number on list.

Mail list to _____ Clerk, _____ County

CERTIFICATION (IF APPLICABLE)

I, _____ Clerk of _____ County do certify this to be a true and correct copy of the original summons issued in this case.

Date: _____
Clerk / Deputy Clerk

OFFICER'S RETURN: Please execute this summons and make your return within ninety (90) days of issuance as provided by law.

I certify that I have served this summons together with the complaint as follows:

Date: 6/20/25

Agency Address

By: James Cox
Please Print: Officer, Title

Signature

RETURN ON SERVICE OF SUMMONS BY MAIL: I hereby certify and return that on _____, I sent postage prepaid, by registered return receipt mail or certified return receipt mail, a certified copy of the summons and a copy of the complaint in the above styled case, to the defendant _____. On _____ I received the return receipt, which had been signed by _____ on _____. The return receipt is attached to this original summons to be filed by the Court Clerk.

Date: _____

Notary Public / Deputy Clerk (Comm. Expires _____)

Signature of Plaintiff

Plaintiff's Attorney (Attach return receipt on this summons to Serve Process)

(Attach return receipt on this summons to Serve Process)

ADA: If you need assistance or accommodations because of a disability, please call TTY: 865/215-2492 ADA Coordinator, at () _____

Knox County
Circuit Court

STATE OF TENNESSEE

Case Number

FILED
CHARLES D. SUSANO
CLERK
page 1 of 1
CIVIL SUMMONS

1-186-25

Shannon Bitzer vs. Jane/John Doe, WBLR, Tegna Inc
1513 Bill Williams Ave. Knoxville TN 37901

Served On:

WBLR

KNOX COUNTY CIRCUIT,
CIVIL SESSIONS
AND JUVENILE COURTS

Civil Court, Knox County, Tennessee.

You are hereby summoned to defend a civil action filed against you in _____ Court, _____ County, Tennessee. Your defense must be made within thirty (30) days from the date this summons is served upon you. You are directed to file your defense with the clerk of the court and send a copy to the plaintiff's attorney at the address listed below. If you fail to defend this action by the below date, judgment by default may be rendered against you for the relief sought in the complaint.

Issued: June 16, 2025

Charles D. Susano III
Clerk / Deputy Clerk

Attorney for Plaintiff:

Shannon Bitzer Pro Se By Eke
7322 Wildwood Ct. Knoxville TN 37920 513-658-1989

NOTICE OF PERSONAL PROPERTY EXEMPTION

TO THE DEFENDANT(S): Tennessee law provides a ten thousand dollar (\$10,000) personal property exemption as well as a homestead exemption from execution or seizure to satisfy a judgment. The amount of the homestead exemption depends upon your age and the other factors which are listed in TCA § 26-2-301. If a judgment should be entered against you in this action and you wish to claim property as exempt, you must file a written list, under oath, of the items you wish to claim as exempt with the clerk of the court. The list may be filed at any time and may be changed by you thereafter as necessary; however, unless it is filed before the judgment becomes final, it will not be effective as to any execution or garnishment issued prior to the filing of the list. Certain items are automatically exempt by law and do not need to be listed; these include items of necessary wearing apparel (clothing) for your self and your family and trunks or other receptacles necessary to contain such apparel, family portraits, the family Bible, and school books. Should any of these items be seized you would have the right to recover them. If you do not understand your exemption right or how to exercise it, you may wish to seek the counsel of a lawyer. Please state file number on list.

Mail list to _____ Clerk, _____ County

CERTIFICATION (IF APPLICABLE)

I, _____ Clerk of _____ County do certify this to be a true and correct copy of the original summons issued in this case.

Date: _____

Clerk / Deputy Clerk

OFFICER'S RETURN: Please execute this summons and make your return within ninety (90) days of issuance as provided by law.

I certify that I have served this summons together with the complaint as follows:

Station Manager

Date: 6/20/25

By: JAMES COX

Please Print: Officer, Title

WCSO
Agency Address

Signature

RETURN ON SERVICE OF SUMMONS BY MAIL: I hereby certify and return that on _____, I sent postage prepaid, by registered return receipt mail or certified return receipt mail, a certified copy of the summons and a copy of the complaint in the above styled case, to the defendant _____. On _____ I received the return receipt, which had been signed by _____ on _____. The return receipt is attached to this original summons to be filed by the Court Clerk.

Date: _____

Notary Public / Deputy Clerk (Comm. Expires _____)

Signature of Plaintiff

Plaintiff's Attorney (or Person Authorized to Serve Process)

(Attach return receipt on back) FOR ASSISTANCE CALL

ADA: If you need assistance or accommodations because of a disability, please call

ADA
Allison Major
865-1215-4437 or
865-1215-2497

<u>Knox County</u> <u>Circuit Court</u>	STATE OF TENNESSEE FILED CHARLES D. SUSAN CLERK CIVIL SUMMONS page 1 of 1	Case Number 1-186-25
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Shannon Bitzer JUNE 16, 2025 Jane / John Doe, WBIR, Tegna, Inc.

Served On:

Jane Doe

KNOX COUNTY / CIRCUIT
CIVIL SESSIONS
AND JUVENILE COURTS

1513 Bill Williams A
Knoxville, TN 379

You are hereby summoned to defend a civil action filed against you in Civil Court, Knox County, Tennessee. Your defense must be made within thirty (30) days from the date this summons is served upon you. You are directed to file your defense with the clerk of the court and send a copy to the plaintiff's attorney at the address listed below. If you fail to defend this action by the below date, judgment by default may be rendered against you for the relief sought in the complaint.

Issued: June 16, 2025

Charles D. Susan
Clerk / Deputy Clerk

Attorney for Plaintiff:

Shannon Bitzer Pro Se
7322 Wildwood Ct, Knoxville, TN 37920 613-658-1989

NOTICE OF PERSONAL PROPERTY EXEMPTION

TO THE DEFENDANT(S): Tennessee law provides a ten thousand dollar (\$10,000) personal property exemption as well as a homestead exemption from execution or seizure to satisfy a judgment. The amount of the homestead exemption depends upon your age and the other factors which are listed in TCA § 26-2-301. If a judgment should be entered against you in this action and you wish to claim property as exempt, you must file a written list, under oath, of the items you wish to claim as exempt with the clerk of the court. The list may be filed at any time and may be changed by you thereafter as necessary; however, unless it is filed before the judgment becomes final, it will not be effective as to any execution or garnishment issued prior to the filing of the list. Certain items are automatically exempt by law and do not need to be listed; these include items of necessary wearing apparel (clothing) for your self and your family and trunks or other receptacles necessary to contain such apparel, family portraits, the family Bible, and school books. Should any of these items be seized you would have the right to recover them. If you do not understand your exemption right or how to exercise it, you may wish to seek the counsel of a lawyer. Please state file number on list.

Mail list to: _____ Clerk, _____ County

CERTIFICATION (IF APPLICABLE)

I, _____ Clerk of _____ County do certify this to be a true and correct copy of the original summons issued in this case.

Date: _____

Clerk / Deputy Clerk

OFFICER'S RETURN: Please execute this summons and make your return within ninety (90) days of issuance as provided by law.

I certify that I have served this summons together with the complaint as follows: NB Not found in my county

Date: 6/20/25

By: James Cox
Please Print: Officer, Title

Agency Address

KCSO

Signature

AA CP 2510

RETURN ON SERVICE OF SUMMONS BY MAIL: I hereby certify and return that on _____ I sent postage prepaid, by registered return receipt mail or certified return receipt mail, a certified copy of the summons and a copy of the complaint in the above styled case, to the defendant _____. On _____ I received the return receipt, which had been signed by _____ on _____. The return receipt is attached to this original summons to be filed by the Court Clerk.

Date: _____

Notary Public / Deputy Clerk (Comm. Expires _____)

Signature of Plaintiff

Plaintiff's Attorney (or Person Authorized to Serve Process)
(Attach return receipt back)

ADA: If you need assistance or accommodations because of a disability, please call

ADA
FOR ASSISTANCE CALL
Allison Major
865 / 215-4487 Coordinator, at ()

865 / 215-2497

<u>Knox County</u> <u>Circuit Court</u>	STATE OF TENNESSEE CIVIL SUMMONS page 1 of 1	Case Number 1-186-25
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Served On:

John DoeKNOX COUNTY CIRCUIT
CIVIL SESSIONS
AND JUVENILE COURTS1513 Bill Williams Ave.
Knoxville TN 37917

You are hereby summoned to defend a civil action filed against you in Civil Court, Knox County, Tennessee. Your defense must be made within thirty (30) days from the date this summons is served upon you. You are directed to file your defense with the clerk of the court and send a copy to the plaintiff's attorney at the address listed below. If you fail to defend this action by the below date, judgment by default may be rendered against you for the relief sought in the complaint.

Issued: June 16, 2025

Clerk / Deputy Clerk

Attorney for Plaintiff:

Shannon Britzer Pro Se
7322 Wildwood Ct. Knoxville TN 37920
NOTICE OF PERSONAL PROPERTY EXEMPTION

TO THE DEFENDANT(S): Tennessee law provides a ten thousand dollar (\$10,000) personal property exemption as well as a homestead exemption from execution or seizure to satisfy a judgment. The amount of the homestead exemption depends upon your age and the other factors which are listed in TCA § 26-2-301. If a judgment should be entered against you in this action and you wish to claim property as exempt, you must file a written list, under oath, of the items you wish to claim as exempt with the clerk of the court. The list may be filed at any time and may be changed by you thereafter as necessary; however, unless it is filed before the judgment becomes final, it will not be effective as to any execution or garnishment issued prior to the filing of the list. Certain items are automatically exempt by law and do not need to be listed; these include items of necessary wearing apparel (clothing) for your self and your family and trunks or other receptacles necessary to contain such apparel, family portraits, the family Bible, and school books. Should any of these items be seized you would have the right to recover them. If you do not understand your exemption right or how to exercise it, you may wish to seek the counsel of a lawyer. Please state file number on list.

Mail list to _____ Clerk, _____ County

CERTIFICATION (IF APPLICABLE)

I, _____ Clerk of _____ County do certify this to be a true and correct copy of the original summons issued in this case.

Date: _____

Clerk / Deputy Clerk

OFFICER'S RETURN: Please execute this summons and make your return within ninety (90) days of issuance as provided by law.I certify that I have served this summons together with the complaint as follows: NB Not Found in my CountyDate: 6/20By: James Cox 2510

Please Print: Officer, Title

Agency Address

Signature

RETURN ON SERVICE OF SUMMONS BY MAIL: I hereby certify and return that on _____, I sent postage prepaid, by registered return receipt mail or certified return receipt mail, a certified copy of the summons and a copy of the complaint in the above styled case, to the defendant _____. On _____ I received the return receipt, which had been signed by _____ on _____. The return receipt is attached to this original summons to be filed by the Court Clerk.

Date: _____

Notary Public / Deputy Clerk (Comm. Expires _____)

Signature of Plaintiff

Plaintiff's Attorney (or Person Authorized to Serve Process)

(Attach return receipt on FOR ASSISTANCE CALL

ADA: If you need assistance or accommodations because of a disability, please call 865-215-4437 or ADA Coordinator, at () _____

**Knox County
Circuit Court**

STATE OF TENNESSEE
CIVIL SUMMONS

Case Number

1-186-25

page 1 of 1

Shannon Bitzer 7825 JUN 27 vs. Tegna Inc., Journalists Jake/John Doe

Served On:

United Agent Group Inc

586 CIVIL SUMMONS Center PKwy, STE 395
Memphis, TN 38120

You are hereby summoned to defend a civil action filed against you in Circuit Court, Knox County, Tennessee. Your defense must be made within thirty (30) days from the date this summons is served upon you. You are directed to file your defense with the clerk of the court and send a copy to the plaintiff's attorney at the address listed below. If you fail to defend this action by the below date, judgment by default may be rendered against you for the relief sought in the complaint.

Issued: 06/27/2025

Charles D. Susano III
Clerk / Deputy Clerk

Attorney for Plaintiff: Shannon Bitzer Pro Se
7322 Wildwood Ct. Knoxville TN 37920

NOTICE OF PERSONAL PROPERTY EXEMPTION

TO THE DEFENDANT(S): Tennessee law provides a ten thousand dollar (\$10,000) personal property exemption as well as a homestead exemption from execution or seizure to satisfy a judgment. The amount of the homestead exemption depends upon your age and the other factors which are listed in TCA § 26-2-301. If a judgment should be entered against you in this action and you wish to claim property as exempt, you must file a written list, under oath, of the items you wish to claim as exempt with the clerk of the court. The list may be filed at any time and may be changed by you thereafter as necessary; however, unless it is filed before the judgment becomes final, it will not be effective as to any execution or garnishment issued prior to the filing of the list. Certain items are automatically exempt by law and do not need to be listed; these include items of necessary wearing apparel (clothing) for your self and your family and trunks or other receptacles necessary to contain such apparel, family portraits, the family Bible, and school books. Should any of these items be seized you would have the right to recover them. If you do not understand your exemption right or how to exercise it, you may wish to seek the counsel of a lawyer. Please state file number on list.

Mail list to _____ Clerk, _____ County

CERTIFICATION (IF APPLICABLE)

I, _____ Clerk of _____ County do certify this to be a true and correct copy of the original summons issued in this case.

Date: _____

Clerk / Deputy Clerk

OFFICER'S RETURN: Please execute this summons and make your return within ninety (90) days of issuance as provided by law.

I certify that I have served this summons together with the complaint as follows: _____

Date: _____

By: _____
Please Print: Officer, Title

Agency Address

Signature

RETURN ON SERVICE OF SUMMONS BY MAIL: I hereby certify and return that on _____, I sent postage prepaid, by registered return receipt mail or certified return receipt mail, a certified copy of the summons and a copy of the complaint in the above styled case, to the defendant _____. On _____, I received the return receipt, which had been signed by _____ on _____. The return receipt is attached to this original summons to be filed by the Court Clerk.

Date: _____

Notary Public / Deputy Clerk (Comm. Expires _____)

Signature of Plaintiff

Plaintiff's Attorney (or Amicus Curiae to Serve Process)

(Attach return receipt on back) 865/215-4437 or

ADA: If you need assistance or accommodations because of a disability, please call TTY: 865/215-2497 Coordinator, at ()

<u>Knox County</u> <u>Circuit Court</u>	STATE OF TENNESSEE FILED CHARLES D. SUSANO CLERK CIVIL SUMMONS page 1 of 1	Case Number <u>1-186-25</u>
<u>Shannon Bitzer</u> vs. <u>WBIR, Tegna Inc., Journalists Jane/John Doe</u>		

Served On: United Agent Group Inc.
5865 Ridgeway Center Pkwy, STE 395
Memphis, TN 38120

You are hereby summoned to defend a civil action filed against you in Circuit Court, Knox County, Tennessee. Your defense must be made within thirty (30) days from the date this summons is served upon you. You are directed to file your defense with the clerk of the court and send a copy to the plaintiff's attorney at the address listed below. If you fail to defend this action by the below date, judgment by default may be rendered against you for the relief sought in the complaint.

Issued: 06/27/2025

Charles D Susano III
 Clerk / Deputy Clerk

Attorney for Plaintiff: Shannon Bitzer Pro Se
7322 Wildwood Ct. Knoxville TN 37920

NOTICE OF PERSONAL PROPERTY EXEMPTION

TO THE DEFENDANT(S): Tennessee law provides a ten thousand dollar (\$10,000) personal property exemption as well as a homestead exemption from execution or seizure to satisfy a judgment. The amount of the homestead exemption depends upon your age and the other factors which are listed in TCA § 26-2-301. If a judgment should be entered against you in this action and you wish to claim property as exempt, you must file a written list, under oath, of the items you wish to claim as exempt with the clerk of the court. The list may be filed at any time and may be changed by you thereafter as necessary; however, unless it is filed before the judgment becomes final, it will not be effective as to any execution or garnishment issued prior to the filing of the list. Certain items are automatically exempt by law and do not need to be listed; these include items of necessary wearing apparel (clothing) for your self and your family and trunks or other receptacles necessary to contain such apparel, family portraits, the family Bible, and school books. Should any of these items be seized you would have the right to recover them. If you do not understand your exemption right or how to exercise it, you may wish to seek the counsel of a lawyer. Please state file number on list.

Mail list to _____, Clerk, _____ County

CERTIFICATION (IF APPLICABLE)

I, _____, Clerk of _____ County do certify this to be a true and correct copy of the original summons issued in this case.

Date: _____
 Clerk / Deputy Clerk

OFFICER'S RETURN: Please execute this summons and make your return within ninety (90) days of issuance as provided by law.

I certify that I have served this summons together with the complaint as follows: by serving WBIR, Tegna Inc
at 5865 Ridgeway Center Pkwy # 390

Date: 7-14-25

By: C. Gates III
 Please Print: Officer, Title

1075 Mullins Station Rd
 Agency Address


SCSO
 Signature

RETURN ON SERVICE OF SUMMONS BY MAIL: I hereby certify and return that on _____, I sent postage prepaid, by registered return receipt mail or certified return receipt mail, a certified copy of the summons and a copy of the complaint in the above styled case, to the defendant _____. On _____ I received the return receipt, which had been signed by _____ on _____. The return receipt is attached to this original summons to be filed by the Court Clerk.

Date: _____

Notary Public / Deputy Clerk (Comm. Expires _____)

Signature of Plaintiff


ADA
 FOR ASSISTANCE CALL
 Plaintiff's Attorney or Person Authorized to Serve Process
 (Attach return receipt on back) 1-800-15-4437 or
 ADA@knoxcounty.gov

ADA: If you need assistance or accommodations because of a disability, please call TTY: 865/215-2497, ADA Coordinator, at ()